

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 23-cv-61256-JB

MONARCH AIR GROUP, LLC,

Plaintiff,

v.

JOURNALISM DEVELOPMENT
NETWORK, INC.,

Defendant.

_____ /

**UNOPPOSED MOTION FOR STAY OR ALTERNATIVELY EXTENSION OF
PRE-TRIAL DEADLINES**

Pursuant to this Court's instructions, as well as Fed. R. Civ. P. 6(b) and S.D. Fla. L. R. 7.1, Defendant Journalism Development Network, Inc. ("JDN") hereby moves unopposed to stay and/or extend the remaining pre-trial deadlines currently set in this case pending resolution of the parties' summary judgment motions. In support of this motion, JDN states as follows:

1. On February 11, 2025, the Court entered a third amended scheduling order, setting this matter for trial beginning October 20, 2025. [ECF No. 151]
2. On August 20, 2025, the Court granted a joint motion for a 30-day continuance and reset the trial for December 1, 2025. [ECF No. 255]
3. Accordingly, the following deadlines are currently set:

October 27	All pretrial motions
October 28	Deposition designations
November 1	Witness and exhibit lists
November 2	Counter-deposition designations

November 7	Objections to counter-designations
November 11	Objections to exhibits; Meet-and-confer regarding the Joint Pretrial Stipulation
November 18	Joint Pretrial Stipulation; Proposed jury questions; Transcripts of depositions for use at trial
November 21	Joint Proposed Jury Instructions; Joint Proposed Verdict Form
November 25	Calendar Call
December 1	Trial begins

4. On October 17, 2025, the Court heard oral argument on the parties' respective motions for summary judgment. At the hearing, the Court indicated that it would be taking the motions under advisement and would shortly be issuing an order, which may impact the upcoming trial. In that regard, the parties also intend to re-engage in further settlement negotiations.

5. This motion is made in good faith, and not for the purpose of delay or any other improper purpose.

WHEREFORE, Defendant Journalism Development Network, Inc. respectfully requests this Court grant this motion and enter an order staying, or alternatively extending, all remaining pretrial deadlines until the Court rules on the parties' summary judgment motions.

GOOD FAITH CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Undersigned counsel certifies that she conferred with counsel for Plaintiff concerning the relief sought in this motion, who advised that Plaintiff does not oppose such relief.

THOMAS & LOCICERO PL

By: /s/ Dana J. McElroy
Dana J. McElroy
Florida Bar No. 845906
dmcelroy@tlolawfirm.com
Daniela Abratt-Cohen
Florida Bar No. 118053
dacohen@tlolawfirm.com
915 Middle River Drive
Suite 309
Fort Lauderdale, FL 33304
Phone: (954) 703-3416

James J. McGuire
Florida Bar No. 187798
jmcguire@tlolawfirm.com
601 South Boulevard
Tampa, FL 33606
Phone: (813)-984-3060

*Attorneys for Defendant
Journalism Development Network, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **20th** day of **October, 2025**, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all parties and counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing.

/s/Dana J. McElroy
Attorney